DEPARTMENT OF WORKFORCE DEVELOPMENT

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TO:	Income Maintenance Supervisors
	Income Maintenance Lead Workers
	Income Maintenance Staff
	W-2 Agencies

Workforce Development Boards Job Center Leads and Managers

Training Staff
Child Care Coordinators

FROM: Amy Mendel-Clemens

Technical Assistance, Training & Education

Section

Bureau of Eligibility Management Division of Health Care Financing

SUBJECT: Citizenship Documentation Requirement CARES Changes

CROSS REFERENCE: Deficit Reduction Act of 2005

Operations Memo 06-32 and related attachments

Operations Memo 06-36

EFFECTIVE DATE: August 12, 2006.

PURPOSE

This is the third in a series of Operations Memos related to the Citizenship and Identity Documentation Requirements project. This memo addresses the following:

- Additional Medicaid policy clarifications, and
- CARES system changes addition of two new MA verification fields to support the new policy and new verification codes.

BACKGROUND

Until now, persons applying for Medicaid (MA) have been required under federal law to declare under penalty of perjury whether they are a citizen of the United States, and if not a citizen, that they are an alien in a satisfactory immigration status. Aliens who declare they are in a

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satisfactory immigration status have been required by federal law to present supporting documentation.

POLICY

The new provision under the federal Deficit Reduction Act of 2005 (DRA) requires that the State obtain satisfactory documentation of citizenship and identity for Medicaid applicants and recipients. Self-attestation of citizenship and identity is no longer an acceptable practice.

SPECIAL CASE PROCESSING

Foster Care and Adoption Assistance

Non-exempt foster children and children receiving adoption assistance who apply for or are receiving MA are subject to the new citizenship and identity documentation requirement. Instructions for implementing the requirement for these populations are being prepared by the Department's Division of Children and Family Services (DCFS). When completed, these instructions will be directed to those individuals within the local agencies responsible for handling issues related to foster care and adoption assistance.

Katie Beckett

Non-exempt children applying for or receiving Medicaid through the Katie Beckett program are subject to the new citizenship and identity documentation requirement. Katie Beckett Medicaid is determined by staff within the Department's Division of Disability and Elder Services (DDES). The new requirement will be implemented by DDES staff for Katie Beckett Medicaid applicants and recipients.

NOTE ➤Individuals no longer receiving MA through foster care, adoption assistance or Katie Beckett, and who are applying for MA through the IM agency, are subject to the new requirement. If you are aware that the requirement has already been met, do not request verification of citizenship or identity. A new code "<OP> - Other Programs Elig determined outside of CARES", has been added to the verification code reference table. Refer to the CARES Changes section of this memo for more information on the new code. If you are not aware that this requirement has been met, the individual must submit acceptable documentation.

TB-Medicaid and Well Woman Medicaid

Non-exempt individuals applying for or receiving TB-Medicaid or Wisconsin Well Woman Medicaid are subject to the new citizenship and identity documentation requirement. Obtain acceptable documentation at application or review and keep copies of acceptable documentation in the applicant's or recipient's case record. Because eligibility for TB-Medicaid and Wisconsin Well Woman Medicaid is not determined by CARES, care should be taken to assure that the documentation requirement is applied only once for applicants and recipients of these benefits.

SSI Recipients and Medicare Beneficiaries

For individuals who are applying for MA, verify that the individual is receiving either Medicare or SSI and do not apply the new requirement. You can verify the receipt of either of these benefits by completing an online query (SOLQ) of DXSX for SSI and DXSA for Medicare. Once you have verified the exempt status for the individual, enter <SC>, in the citizenship and identity verification code fields.

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CARES CHANGES

AUGUST 12, 2006 CHANGES

The next phase of CARES system changes will be implemented August 12, 2006 and include two new fields that will be used exclusively by the MA program and provide the ability to separately pend or fail MA eligibility. The following two new fields will be added to CWW:

- US Citizenship MA Verification field will be added to the CWW Permanent Demographics page
- Identification MA Verification field will be added to the CWW Current Demographics page

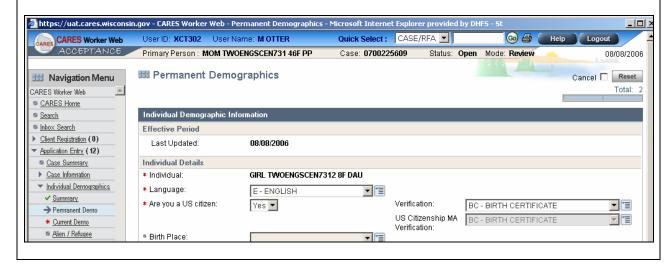
This new functionality will allow for the failure of MA when an invalid code is entered for US citizenship verification or identification verification, the verification time period has elapsed, and no good faith effort is being made to obtain the necessary verification.

Conversion Code

On August 13, 2006 a one time program will be run to populate a code into the new fields. The chart below explains what will occur during this conversion process:

Verification Code	Description
Existing	Will be copied from the existing verification field and populated into the new
verification code	MA verification fields when the existing verification code is valid for MA.
	This will be done for all individuals in CARES
CN	Will be populated in the new MA verification fields when the code in the
	existing verification field is not valid for MA for citizenship or identification.
	This will be done only for individuals open for MA.
FS	Will be populated into the new MA identification verification field for the PP
	if the PP is/was eligible for FS at anytime in CARES.
Q?	Will be populated in the new MA verification fields if MA is already pending
	for citizenship or identification

Example 1: BC – Birth Certificate was the current entry in the existing citizenship verification field. During the conversion process, BC – Birth Certificate was populated into the new MA verification field because BC is a valid code for MA.



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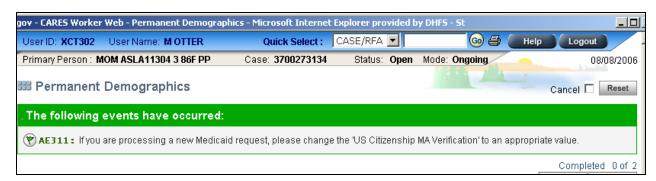
The <CN> code entered during this conversion will be deleted from the MA verification fields at review, intake or person add so that the proper verification codes can be entered based on the documentation presented by the customer to verify citizenship and identity.

NEW FIELD FUNCTIONALITY

The new MA verification fields work the same way for citizenship and identification verification. The new fields are required for EBD MA, Family MA, BadgerCare and Family Planning Waiver Program cases

- 1. If there is a valid code (for MA) in the existing verification field, no action is necessary because the valid verification code will have been populated into the new MA verification field. See Example 1.
- If a case is in ongoing mode and open for MA, and the existing verification field has a code that is not valid for MA, the conversion code of <CN> will display in the new MA verification field. <CN> should be left in the field as no MA verification is needed until the next review. The <CN> code will drop out of the verification field at review.
- 3. During review, intake or person add, the worker will need to do one of two things: either enter a valid code into the existing verification field based on the documentation presented by the customer to verify citizenship or identity, or if documentation is not presented, leave the current code in the existing verification field and enter <Q?> in the new MA verification field in order to properly pend the MA case awaiting valid verification.

When adding an MA program request to an existing case and there is not currently a valid MA verification code in the existing field, the following informational message will be displayed.



When the valid verification is received, for example a birth certificate is presented to verify citizenship, the worker will update the existing citizenship verification field with <BC>. When a valid verification code is entered, CARES will automatically populate that verification code in the new MA verification field.

If valid verification is not received for MA, the worker can leave the code in the existing verification field, that may be valid for and pass another program, but must enter <QV> in the new MA verification field in order to fail MA for failure to verify citizenship or identity using a valid document.

4. When a <?> or <Q?> is entered into the existing verification field in order to pend the case awaiting verification, CARES will automatically populate the <?> or <Q?> into the new MA verification field and verification will be requested.

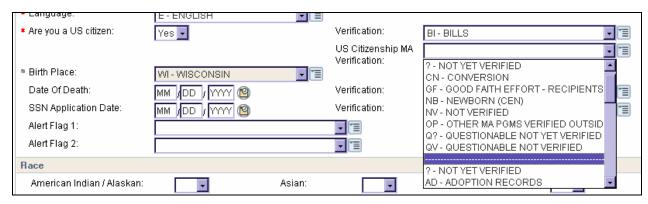
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NOTE ➤If there is a group level request for MA you will have to enter a verification code for all individuals, even if the individual request is a NO. If the individual is not requesting or eligible for MA, enter <NQ> in the new MA verification field

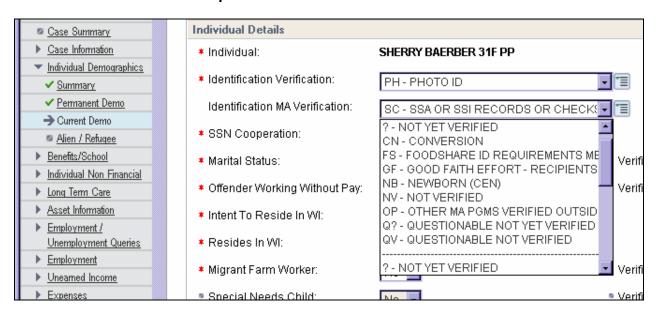
REFERENCE TABLE CHANGES

The reference table drop-down list has been updated with new verification codes based on the new policy. The codes appearing above the broken line represent the codes valid for MA and that can be entered into the new MA verification fields by workers. Remember, all other valid codes will auto populate in this new field when entered in the existing field.

US Citizenship MA Verification Drop-down list



Identification Verification Drop-down list



New Codes added to the reference table

NB – Newborn. When a newborn is being added to a case no verification is necessary, until the next review is performed on the case. If verification is presented for another program of assistance, enter that verification code in the existing field and if that code is not valid for MA, enter <NB> in the new MA verification field. If no verification is presented, enter <Q?> in the existing verification field and <NB> in the new MA verification field. This will allow the worker to confirm eligibility for the newborn. The <NB> code will be removed from the field at review or intake when the individual is subject to the new requirement.

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FS – FoodShare ID requirement met. Verifying the identity of the primary person is a requirement for a FoodShare application. Once this requirement is met for FS, it is also met for the new identity verification requirement for MA. The new <FS> code will be entered by CARES when there is a request for FoodShare and a valid FS verification code for identity is entered in the existing verification code field. When a valid verification code is entered, <FS> will automatically populate in the new MA verification code field for the Primary Person. <FS> remains a valid MA verification code for the primary person even if the individual is not eligible for FoodShare benefits.

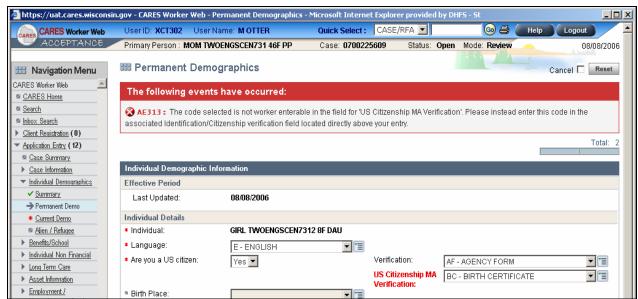
- **GF Good Faith Effort.** Enter this code to grant MA eligibility to recipients (not applicants) while awaiting valid documentation.
- **OP Other Programs Elig. determined outside of CARES.** Enter this code in the new MA verification field to grant MA eligibility for an individual who had been receiving foster care, adoption assistance or Katie Beckett services, but is now applying for MA at the IM agency; the citizenship and identity verification requirement should have been completed by another State department.

Worker entered <GF> and <NB> codes will be deleted from the MA verification fields at review and intake so that the proper verification codes can be entered based on the documentation presented by the customer to verify citizenship and identity.

Event Panel Messages

Certain new event panel messages will display when invalid codes are entered into the new MA verification code field.

Example 2: Although <BC> is a valid code for MA, the code must be entered in the existing verification field. By entering <BC> in the existing verification field, CARES will automatically populate <BC> in the new MA verification field.



Good Faith Code

More time may be allowed for recipients making a good faith effort to supply the required documentation, but who are unable to do so during the reasonable opportunity period. By "good faith effort" we mean the recipient is taking steps to obtain the necessary documentation and has notified his/her worker of such efforts or has requested assistance from the worker to

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obtain the necessary documentation. Recipients can have their eligibility extended while they are working on submitting the necessary documentation.

For a case at review or a case where the MA is closed <u>less</u> than 30 days, follow these steps:

- 1. At review or when the case is reopened and verification is not submitted, the worker can enter <Q?> or <?> into the new verification field and issue the initial request for verification.
- If before the due date verification period expires, the recipient contacts the worker stating they are having difficulty obtaining the necessary documentation and/or requesting assistance from the worker, the worker can enter the good faith code <GF> into the new verification fields.
- 3. Run SFEX and confirm eligibility so that MA passes for those recipients making a good faith effort to comply with the new requirement.
- 4. Once eligibility has been confirmed, the worker should immediately go back and enter <Q?> or <?> to pend the case, and extend the verification due date for 30 days on AGVC. An additional verification request will be sent so the recipient is aware that they still need to continue to obtain valid documentation.
- 5. If the extended good faith verification period has elapsed and the recipient is not exhibiting any effort in obtaining valid documentation and has not requested assistance, enter <QV> in the new MA verification field, run SFEX and confirm the failure of MA.
- 6. If the recipient supplies valid verification within the extended period, enter the proper code in the existing verification field based on the document presented. When the code entered is valid for MA, CARES will populate the same code in the new MA verification field. Run SFEX/SFED and confirm eligibility.

Extension of Reasonable Opportunity Period

Individuals applying for MA currently receive the 30 day application processing period as their reasonable opportunity period in which to provide valid citizenship and/or identification verification; however, their reasonable opportunity period can be extended if they are trying to provide the necessary documentation, or have requested assistance, and their application filing date will be honored if the necessary documentation is ultimately obtained. Unlike the policy for recipients, eligibility for MA is not granted to applicants until the requirement is met, even if they are trying to provide the documentation and have requested assistance. Use the following processing guidelines for new applicants who are having difficulty obtaining valid citizenship and/or identity verification:

- For a new applicant enter a <Q?> or <?> in the existing and new citizenship and/or identity verification fields. If verification is provided for another program of assistance, enter that code in the existing verification field. By also entering a <Q?> or <?> in the new MA verification field, CARES will send out the verification request form. For an applicant who is already known to CARES, if the verification code is not valid for MA, enter <Q?> in the new verification field.
- 2. If the individual supplies valid verification within the 30 day application period, enter the proper code in the existing verification field based on the document presented. When the code entered is valid for MA, CARES will populate the same code in the new MA verification field. Run SFEX and confirm eligibility.

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3. If the original 30 day verification period has elapsed and the customer is communicating that they are still attempting to obtain the valid documentation, or you are attempting to assist the applicant in obtaining valid documentation, eligibility can remain pending until the verification is obtained or the worker determines the customer is no longer exhibiting an effort to obtain the verification. Enter a new verification request date on CARES Mainframe screen AGVC to generate a new verification request letter with the new date. An additional 30 days can be allowed when the verification date is extended.

- 4. If the extended application period has elapsed and the customer is not exhibiting any effort in obtaining valid documentation, enter <QV> in the new MA verification field, run SFEX and confirm the MA denial.
- 5. If the individual supplies valid verification within the extended application period, enter the proper code in the existing verification field based on the document presented. When the code entered is valid for MA, CARES will populate the same code in the new MA verification field.

Eligibility should be determined back to the original filing date. If eligibility is determined for BadgerCare, with a premium, check AGEC to see that all months back to the original filing date appear before confirming eligibility. If only the current month displays, contact the CARES Call Center for assistance.

ATTACHMENT

Updated 06-32 Citizenship and Identity Valid Verification Codes <u>list</u> – Revised 8-10-06

CONTACTS

BEM CARES Information & Problem Resolution Center

[★]Program Categories – FS – FoodShare, MA – MA, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.